

**From:** Breedon, Dan  
**Sent:** Tuesday, October 06, 2015 10:31 AM  
**To:** CEQA Guidelines  
**Subject:** Proposed Updates to the CEQA Guidelines - Appendix G

Two comments provided below:

First Comment

IX. Hydrology and Water, Items g., h. and i. (now proposed to be removed) are no longer adequately represented in terms of their subject matter:

~~g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?~~  
~~h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?~~  
~~i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?~~

These items appear to have been somewhat replaced with the 4 items under VIII, and IX, shown below. Of these two item VIII. h. speaks the most directly to flooding, but it is included in a sentence concerning wildland fires and other hazards. Seems a little confusing not to have flooding (as previously represented under items g. h. and i.) with its own separate entry. The sentence is also confusing, tries to say too much, and could be misinterpreted. I would recommend including a separate entry and combining the previous g. h. and i. items into one entry for consolidation purposes. It may also be appropriate to address consistency with the Central Valley Flood Protection Plan as it relates to flood impacts.

VIII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, flooding or other inundation, unstable soils and other potential hazards including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or  
(iv) impede or redirect flood flows?

Second Comment

Pertaining to checklist item:

VIII. HAZARDS AND HAZARDOUS MATERIALS

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

You may want to review combining these two items under one item. These two discussions can often overlap and this can be confusing for users and reviewers. I would recommend deleting item XVI. d. below and inserting it into VIII. g. since this question really speaks more directly to hazards than transportation.

XVI. TRANSPORTATION/~~TRAFFIC~~ --

Would the project:

d) Result in inadequate emergency access?

Thanks for your consideration.